

# **EXHIBIT 91**

**Declaration of Joseph Hand,  
Jr.**

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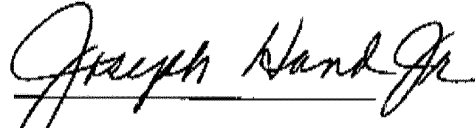
1. My name is Joseph Hand, Jr., and I am the President of Joe Hand Promotions, a distributor of closed circuit pay-per-view MMA, boxing, WWE, and other sports and entertainment broadcasts to non-residential establishments, such as bars and restaurants. I have worked with Zuffa, and the UFC's previous owners before them, to distribute UFC events for over ten years.
2. The marketplace in which I operate is highly competitive. There are literally hundreds of other companies trying to sell competing sports and entertainment programming to bars and restaurants.
3. UFC competes head-to-head with boxing and WWE for closed circuit distribution. In one clear example of head-to-head competition, the UFC aired an event on the same night as a championship boxing event, and our sales for the UFC event decreased approximately 12% from our average (for that time period).
4. The UFC also clearly competes directly with other sports and entertainment events for closed circuit distribution. Examples from the last year include the a loss of approximately 5% of our sales (from the average) due to an NFL Stanley Cup Playoff game between Philadelphia and Chicago (two of our larger markets); an approximately 15% sales decline (from the average) due to various New Years Day college football games; and a recent cancellation of 114 locations (approximately 3% of sales) due to the NCAA March Madness Basketball Tournament.
5. In addition, our customers frequently televise multiple supporting events simultaneously. Because of this, the competition between events is actually understated by the losses described above. Instead, the competition is readily apparent, for example, by viewing the patrons within a sport bar drifting back and forth to watch multiple different events. Such events might range from the UFC, to boxing, to tennis, to the Lingerie Football League, to horse racing or to the World Series of Poker.
6. The UFC has a huge advertising and branding lead over other MMA promotions due to the fact that Zuffa single-handedly created MMA as a saleable product and has gone above and beyond in helping to build interest in the sport.
7. One of many examples of Zuffa's promotional skill that I recall involved a UFC event in Houston in 2007. Due to the customary practice of not distributing closed circuit events within 30 miles from the site of an event, upwards of 60 Houston bars were "black-out" – in other words, they were unable to purchase and show the UFC event. Zuffa personnel called me personally and asked me to offer each of the bar owners subject to the black-out four free ringside tickets to the event. Zuffa also asked me to inform the bar owners that on the night of the event, UFC fighters (not participating in the event) would arrive to sign autographs, shake hands, and pose for photos with patrons. These bar owners (and their patrons) became loyal supporters of the UFC, and

were happy to put up posters and help promote (and fill the bar) for subsequent UFC events.

8. The UFC's acquisition of Strikeforce will likely allow the UFC to distribute more high quality events on pay-per-view, which will benefit my business, our customers, and UFC fans. Since, on its own, Strikeforce was not a compelling product that could create significant demand on pay-per-view, let alone, demand for the attention of sports bar patrons, I am not at all concerned about any potential loss of competition due to the acquisition.

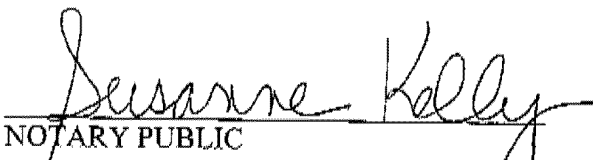
I declare under penalty of perjury that the foregoing is true and correct.

Executed this 7 day of December, 2011, in the city of Feasterville, PA

  
Joseph Hand, Jr.

Dated: 12/7/11

Sworn to before me on this 7<sup>th</sup> day  
of December, 2011

  
NOTARY PUBLIC

